

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

Bilgin Şaşmaz,)	
)	
Plaintiff,)	
)	No. 4:14-cv-1901 ERW
v.)	
)	
County of St. Louis, Missouri, et al.,)	
)	
Defendants.)	

MOTION FOR LEAVE TO CONDUCT EARLY DISCOVERY

Comes now Plaintiff and moves this Court for leave to conduct discovery before the time specified by Federal Rule of Civil Procedure 26(d)(1). In support, he states:

1. On November 10, 2014, 2014, Plaintiff filed this cause of action pursuant to 42 U.S.C. § 1983, alleging that Defendants engaged in unconstitutional conduct. (Doc. # 1).
2. The County of St. Louis, Missouri, waived service (Doc. # 3).
3. The other defendant has not been served. He is denominated as “John Doe” in the Complaint and described as follows:

Defendant John Doe, whose name is not known to Plaintiff, was a police officer with the County of St. Louis Police Department at all times relevant to this complaint. On or about August 19 and 20, 2014, Doe encountered Plaintiff and interacted with him as described in this

complaint. Doe is sued in his individual capacity only.

(Doc. # 1 at ¶ 8).

4. Neither Plaintiff nor his counsel has been able to ascertain Doe's identity and, thus, they have been unable to effectuate service of process.

WHEREFORE Plaintiff respectfully requests this Court grant him leave to conduct discovery limited to the subject of the identity of John Doe and his whereabouts.

Respectfully submitted,

/s/ Anthony E. Rothert
ANTHONY E. ROTHERT, #44827MO
GRANT R. DOTY, #60788MO
ANDREW MCNULTY, #67138MO
ACLU of Missouri Foundation
454 Whittier Street
St. Louis, Missouri 63108
Phone: (314) 652-3114
Fax: (314) 652-3112
trothert@aclu-mo.org
gdoty@aclu-mo.org

GILLIAN R. WILCOX, #61278MO
ACLU of Missouri Foundation
3601 Main Street
Kansas City, Missouri 64111
Phone: (816) 470-9938
gwilcox@aclu-mo.org

ATTORNEYS FOR PLAINTIFF

Certificate of Service

I certify that on March 2, 2015, a copy of the foregoing was served by first-class mail on counsel for Defendant.

/s/ Anthony E. Rothert